

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	NO. 5:19-cr-00581-001
v.	:	
	:	
ANGELO PERRUCCI, JR.	:	

MOTION FOR CONTINUANCE

Angelo Perrucci, Jr., by and through his attorney, Erv D. McLain, Esquire, respectfully requests a continuance in this matter. In support of this motion, Defendant avers as follows:

1. Defendant Angelo Perrucci, Jr. appeared on or about September 30, 2019, for an initial appearance on a complaint and warrant, which charged him with three counts wire fraud in violation of 18 U.S.C. §1343.
2. This matter has been continued twice before at the request of defendant, Angelo Perrucci, the second of which continuances was granted January 24, 2020.
3. The matter was scheduled for a Change of Plea Hearing on March 11, 2020 at which time defendant Perrucci entered a guilty plea.
4. The matter was then scheduled for sentencing on July 30, 2020.
5. Defendant's crimes are financial in nature and as a result, he is attempting to make full restitution prior to the date of sentencing.

6. Defendant and the Government have agreed that the plea was entered leaving the amount of money involved in the criminal conduct open for establishment by the Court at the sentencing hearing.

7. Since that time our country has been beset by the Corona Virus pandemic during and as such defendant Perrucci's attempts to procure an expert and raise the funding necessary to make full restitution have been substantially delayed.

7. As our country has made strides to address the pandemic and has begun to conduct business once again the prospects for raising the funds necessary to raise the amount necessary to make all restitution has been greatly enhanced and he has been able to recently interview experts for the sentencing hearing.

8. Defendant Perrucci's presence would substantially facilitate the efforts to raise the restitution and assist in the evaluation and preparation of his expert witness.

9. Defendant Perrucci believes and therefore avers that if the sentencing in this matter is continued until mid-September, he will have been able to raise the funding necessary to make full restitution at that time.

10. If he is unavailable to assist counsel in raising the funds the time necessary to provide full restitution would be substantially extended.

11. Assistant U.S. Attorney Christopher J. Mannion, Esquire on has been consulted regarding this Motion and has no objection to its grant so long as the matter is continued no later than August 29, 2020.

WHEREFORE, your Defendant respectfully submits that the ends of justice will best be served by a continuance in this matter for a period not to exceed sixty (60) days.

Respectfully submitted,

McLAIN & ASSOCIATES

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